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**From:**

**Sent:** July 22, 2008

**To:**

**Cc:**

**Subject:** IRC 1362(d)

We have been asked this question in the past, and have concluded that there is no legal authority for us to grant a PLR retroactively revoking an S election. Assuming the election was effective (for example, it included all the necessary consents), then only prospective relief is available from the Service.